

**IN THE CIRCUIT COURT OF ST. LOUIS COUNTY  
STATE OF MISSOURI**

STATE OF MISSOURI ex rel., Attorney	)	
General Chris Koster and the Missouri	)	
Department of Natural Resources,	)	
	)	
Plaintiff,	)	Case No. 13SL-CC01088
	)	
v.	)	
	)	
REPUBLIC SERVICES, INC.,	)	
	)	
ALLIED SERVICES, LLC, and	)	
	)	
BRIDGETON LANDFILL, LLC,	)	
Defendants.	)	
	)	

**STATUS REPORT**

Comes now Bridgeton Landfill, LLC (“Bridgeton Landfill”) by and through counsel, and states as follows:

1. On May 13, 2013, an Agreed Order was entered requiring a status report to be submitted on or before June 3, 2013 and the first business day of each month thereafter.
2. The status update must discuss, at a minimum, work on site, compliance with the Agreed Order, and planned activities for the next 30 days.
3. This serves as a status report as required under the Agreed Order.

**REPORT OF WORK ON SITE**

During September 2014, Bridgeton Landfill conducted the following Work on the Site:

4. Routine erosion control and maintenance and ongoing monitoring consistent with facility operations and agreed process;
5. Continuation of operation and maintenance of gas collection and control system;

6. Continuation of upgrades to gas collection and control system as needed;
7. Continuation of coordination with utility company of final connection of the natural gas line to the flare compound;
8. Continuation of operation of Thermal Oxidizer air treatment unit on 316k gallon leachate treatment tank;
9. Continuation of operation of 5,000 SCFM Regenerative Thermal Oxidizer for odor control for Tanks 1 and 2 of one-million gallon leachate treatment tanks;
10. Continuation of operation of pre-treatment plant;
11. Continuation of construction on phase one of leachate force main construction;
12. Continued implementation of Odor Management Plan;
13. Initiation of temperature reporting for three new temperature monitoring probes in North Quarry consistent with MDNR direction;
14. Continuation of odor reduction pilot study implementation to further the Odor Investigation required by the Second Amendment to the First Agreed Order;
15. Continuation of work to lower gas extraction wells;
16. Continuation of removal of unused above-grade piping material;
17. Continued soil addition to restore grades and flows to gas system piping in areas affected by settlement;
18. Initiation of the first quarterly groundwater monitoring event as directed under the facility's *Assessment Monitoring Plan* was on September 22, 2014;
19. Completion of third quarter slope stability evaluation on September 3, 2014;
20. Initiation of CO and gas quality monitoring for Gas Interceptor Wells;

21. Initiation of expanded cooling pilot study, including completion of additional TMP installation and procurement of materials; and
22. Continuation of routine operation and maintenance of gas interceptor wells and temperature monitoring probes.

### **REPORT OF COMPLIANCE WITH AGREED ORDER**

In addition to the work on Site, as outlined above, Bridgeton Landfill conducted the following activities in compliance with the direction of the Agreed Order:

23. The weekly reports required under Section 52.F were submitted on September 3, 2014, September 9, 2014, September 17, 2014, September 23, 2014 and September 30, 2014;
24. The monthly report required under Section 52.E was submitted on September 2, 2014; and
25. A response to the August 29, 2014, data report and September 4, 2014, MDNR letter was provided on September 18, 2014.

### **REPORT OF PLANNED ACTIVITIES FOR NEXT 30 DAYS**

During the next thirty (30) days, Bridgeton Landfill plans to conduct the following activities at the Site:

26. Continue ditching and drainage work and routine sediment and erosion control;
27. Continue operations of the on-site leachate pre-treatment plant, and tank farm;
28. Continue Odor Management Plan;
29. Continue pilot study to further the Odor Investigation required by the Second Amendment to the First Agreed Order;
30. Continue coordination with the utility company of final connection of the natural gas line to the flare compound;

31. Continue work to lower gas extraction wells;
32. Continue soil addition to restore grades and flow to piping in areas impacted by settlement;
33. Continue construction on phase one of leachate force main construction; and
34. Continue implementation of approved expanded cooling project pilot study.

Dated: October 1, 2014

**LATHROP & GAGE LLP**

By: /s/ Matthew A. Jacober

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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the above pleading was served via first class United States mail, postage prepaid, on this 1<sup>st</sup> day of October, 2014, upon the following counsel of record:

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/s/ Matthew A. Jacober  
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An Attorney for Defendant